

**REPORT OF CONSUMER INFORMAL COMPLAINTS**  
**JULY 1, 2014 – JUNE 30, 2015**  
**Top Telecommunications Relay Service (TRS) Issues**

**Telecommunications relay services (TRS):** TRS is a telephone service that allows people who are deaf, hard of hearing, deaf-blind, or have a speech disability to place and receive telephone calls. There are several forms of TRS, depending on the particular needs of the user and the equipment available.

**Forms of TRS**

**Traditional TRS:** allows people who are deaf, hard of hearing or have a speech disability to use a text telephone device (TTY) to call the TRS relay center and give a communications assistant (CA) the number of the party that they want to call. The CA at the relay center then makes a voice telephone call to the other party to the call, and relays the call back and forth between the parties, by speaking what a text user types and typing what a voice telephone user speaks.

**Internet Protocol Relay (IP Relay):** operates in the same way as traditional TRS, except that the text is sent via a computer or other similar device over a broadband Internet connection.

**Speech-to-Speech (STS) Relay Service:** allows people who have a speech disability to use a conventional telephone to call a CA (who is specially trained in understanding a variety of speech disorders), who then repeats what the caller says in a manner that makes the caller's words clear and understandable to the called party. No special telephone is needed.

**Video Relay Service (VRS):** allows people who are deaf or hard of hearing to communicate in sign language with voice telephone users over a broadband Internet connection using video equipment. The video link allows the CA to view the party's signed conversation and to relay the conversation back and forth with the other party to the call by signing what the voice telephone user says to the deaf or hard of hearing user and responding in voice to the voice telephone user.

**Captioned Telephone Service (CTS):** allows people who are hard of hearing to speak directly with another party on a telephone call and to both listen to and read captions of what that party is saying, in real-time, on a captioned telephone. The captioned telephone has a text screen to display captions of what the other party to the conversation is saying. The captions can be generated in a variety of ways.

**Internet Protocol Captioned Telephone Service (IP CTS):** operates in the same way as CTS, except that this service uses the Internet – rather than the telephone network – for the transmission of captions. An individual can access IP CTS with an IP captioned telephone, laptop computer, tablet or smartphone.

## **COMPLAINTS BY SERVICE**

**VRS:** 71.2% of complaints (310)

**IP Relay:** 13.8% of complaints (60)

**IP CTS:** 7.4% of complaints (32)

**Traditional TRS, CTS, and STS:** 3% of complaints (13)

**Other/Unidentifiable:** 4.6% of complaints (20)

**Total:** 435 complaints<sup>1</sup>

## **COMPLAINTS BY TYPE**

**Equipment / Service Issues:** Technical difficulties with the TRS provider's service or equipment - which may be caused by back-end problems on the provider's side or by deficient / malfunctioning customer premises equipment (CPE) issued by the provider. 19.8% of complaints (86).

**Slamming and porting:** In general, slamming occurs when a VRS provider changes a consumer's preferred VRS provider without the customer's permission. Porting involves changing the preferred VRS provider at the request of the consumer. Porting problems may arise if the exiting service provider is not cooperative in releasing the consumer's telephone number to the consumer's new relay service provider. 19.8% of complaints (86).

**Marketing practices:** Involves complaints in which a consumer believes he or she was not fully informed by the TRS provider's marketing/advertising/promotions, and where products or services may have been advertised but the consumer believes that the TRS provider did not fulfill or follow through with the promises as advertised. 18.1% of complaints (79).

**Customer service:** Includes consumer-expressed dissatisfaction with the TRS provider's service or product, the provision of technical support, or the conduct of a provider's employees. 13.1% of complaints (57).

**Policy issues:** Involves complaints where the consumer has an issue with specific rules and policies of the Commission or the effects they have on TRS providers. 13.1% of complaints (57).

**Problems due to bandwidth:** Refers to difficulties caused by a consumer's Internet provider affording insufficient data throughput to enable the consumer to reliably utilize their

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<sup>1</sup> In this section, the numbers in parentheses represent the number of complaints relating to each "service" category. The total of those numbers equals 435, the total number of complaints. In the next section, the numbers in parentheses represent the number of complaints relating to each "type" category. However, 91 of the 435 total complaints were determined to fall in more than one "type" category. Therefore, the numbers in parentheses in the section on "Complaints by Type" add up to more than 435.

Internet-based relay service. 9.2% of complaints (40).

**Quality of the Communications Assistant:** Encompasses an array of factors, including lack of accuracy in messaging or sign language interpreting and the demeanor of the CA. 6% of complaints (26).

**Data cap/pricing:** Involves difficulties caused by a consumer having purchased a data plan that turns out to be insufficient to meet the consumer's data needs; may include having to pay excessive charges to obtain sufficient data capacity. 4.8% of complaints (21).

**Interoperability:** Pertains to the inability of a consumer's equipment to interface with a different VRS provider's network and video devices for point-to-point video calls. 4.4% of complaints (19).

**Video mail:** Refers to the inability of a consumer using one provider's video device or application to send or receive video mail (the VRS equivalent of voicemail) to or from another consumer using a different VRS provider's video device or application. 3% of complaints (13).

**Refusal to accept TRS calls:** Occurs when the intended recipient of a call placed through a relay service refuses to accept the call because it is being placed through a relay service. If the intended recipient is a business or place of public accommodation, this type of complaint is usually referred by the Disability Rights Office to the Department of Justice as a potential rule violation under the Americans with Disabilities Act. 3.2% of complaints (14).

**Speed of answer:** The amount of time between the TRS provider's receipt of a call and a CA becoming available and ready to relay the call. 1.8% of complaints (8)

**Other miscellaneous complaints:** Complaints not falling into one of the foregoing categories. 4.8% of complaints (20).